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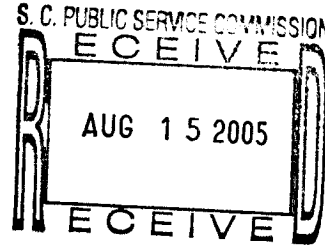
SCOTT ELLIOTT

TELEPHONE (803) 771-0555
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August 11, 2005

VIA U. S. MAIL

Mr. Charles Terreni
Chief Clerk of the Commission
SC Public Service Commission
P. O. Drawer 11649
Columbia, SC 29211



RE: Generic Proceeding to Explore a Formal Request For Proposal
Process For Utilities That Are Considering Alternatives For Adding
Generating Capacity

Docket No. 2005-191-E

Dear Mr. Terreni:

Enclosed please find for filing an original and ten (10) copies of the Petition to Intervene of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record.

121 I have enclosed an extra copy of this petition which I would ask you to date stamp and return to me in the stamped self-addressed envelope provided. If you have questions, please feel free to contact me.

Sincerely Yours,

ELLIOTT & ELLIOTT, P.A.



Scott Elliott

SE/mlw
Enclosures

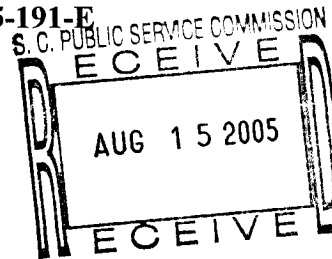
cc: All parties of record (w/enc.)

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STATE OF SOUTH CAROLINA

BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2005-191-E



PETITION TO INTERVENE

IN THE MATTER OF:)
)
Generic Proceeding to Explore a Formal)
Request For Proposal Process For)
Utilities That Are Considering Alternatives)
For Adding Generating Capacity)

The South Carolina Energy Users Committee ("SCEUC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-836 of the Commission's rules and regulations to intervene and be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

1. That in its Order 2005-2 in Docket No. 2004-178-E, the Commission directed that a generic docket be opened to explore a formal Request for Proposal (RFP) process for utilities considering alternatives for adding generating capacity; that accordingly, Docket No. 2005-191-E was opened to gather an array of options and opinions from the utilities, their customers and suppliers concerning a competitive bidding process so as to examine the issue of competitive bidding for the procurement of additional capacity; and that the issues before the Commission in this docket are whether to implement a formal RFP process, and if so, what the RFP process should include and how RFPs should be evaluated.

OK postmarked
OK RBD

2. That SCEUC is an association organized in the State of South Carolina, consisting of large consumers of energy which are engaged in various manufacturing enterprises throughout the State.

3. That members of SCEUC purchase and consume substantial amounts of electricity from the electric utilities in South Carolina to include Carolina Power & Light d/b/a Progress Energy Carolinas, Inc., Duke Power, and South Carolina Electric and Gas Company.

4. That SCEUC and its members have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.

5. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.

6. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.

7. That in accordance with Rule R. 103-804 (S) of the Commission's Rules of Practice and Procedure, Petitioner is represented by counsel in this proceeding:

Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, South Carolina 29205
Telephone: 803-771-0555
Fax: 803-771-8010

WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;

- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- c. For such other and further relief as is just and proper.

P.3



Scott Elliott, Esquire
ELLIOTT & ELLIOTT, P.A.
721 Olive Street
Columbia, SC 29205
(803) 771-0555

Attorney for the South Carolina Energy
Users Committee

Columbia, South Carolina
August 11, 2005

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Generic Proceeding to Explore a Formal Request For
Proposal Process For Utilities That Are Considering
Alternatives For Adding Generating Capacity

DOCKET NO.: 2005-191-E

PARTIES SERVED: Florence P. Belser, Esquire
Office of Regulatory Staff
PO Box 11263
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Frank R. Ellerbe, III, Esquire
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PO Box 944
Columbia, SC 29202

Len S. Anthony, Esquire
Kendal Bowman, Esquire
Carolina Power and Light Company
d/b/a Progress Energy Carolinas, Incorporated
PO Box 1551
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Patricia B. Morrison, Esquire
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1426 Main Street
Legal Department, Mail Code 130
Columbia, SC 29201

Richard L. Whitt, Esquire
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PO Box 11716
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Kodwo Ghartey-Tagoe, Esquire
Duke Power, a division of
Duke Energy Corporation
PO Box 1244, PBO5E
Charlotte, NC 28201

PLEADING:

PETITION TO INTERVENE BY SOUTH CAROLINA
ENERGY USERS COMMITTEE

August 11, 2005



Marcia L. Walters, Legal Assistant